

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVAN VAVIC,

Defendant.

CRIMINAL NO.: 19-CR-10081-IT

**MOTION TO CONTINUE ANY SENTENCING HEARING DATE
AND ASSOCIATED DEADLINES**

Jovan Vavic, through undersigned counsel, respectfully moves for an order continuing any sentencing date to a date to be determined by the Court, together with associated deadlines to file objections to his presentence report and his sentencing position paper.

As grounds for the motion, Vavic states that his motion for acquittal or a new trial remains pending and counsel will be traveling out of the country from today, August 24, 2022 – September 7, 2022. Based on the current sentencing date, the objections to Vavic’s presentence report are currently due today, August 24 (the day counsel leaves) and his sentencing position paper is currently due on September 7 (the day counsel returns). As such, should the Court ultimately proceed with sentencing, following its ruling on the motion for acquittal or a new trial, counsel will require additional time to prepare Vavic’s objections and sentencing position paper.

Counsel has conferred with the Government and the Courtroom Clerk regarding dates for sentencing. The Government objects to a continuance of any sentencing.

WHEREFORE, Vavic respectfully request that the Court grant this motion to continue any sentencing date and associated deadlines to a date to be determined by the Court.

Dated: August 24, 2022

Respectfully submitted,

/s/ Koren L. Bell

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Koren L. Bell

Koren L. Bell